

EDOK Criminal Complaint (Revised 6/13)

United States District Court
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON LEON CRUSE,

Defendant.

CRIMINAL COMPLAINT

Case No. 21-MJ-283-SPS

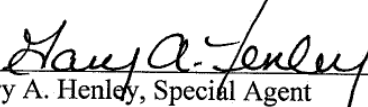
I, Gary A. Henley, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about June 18, 2000, in the Eastern District of Oklahoma, in Indian Country, **JASON LEON CRUSE**, committed the crime of **MURDER IN THE FIRST DEGREE IN INDIAN COUNTRY**, in violation Title, 18 United States Code, Section 1111(a).

I further state that I am a Special Agent with Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Gary Henley, which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.



Gary A. Henley, Special Agent
Federal Bureau of Investigation
Complainant

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: June 17, 2021

UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer



Signature of Judicial Officer



**IN THE UNITED STATES
DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Gary A. Henley, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have been so employed since May, 1998. I am currently assigned to the Special Operations Group of the New York Division of the FBI and have been assigned to that squad for approximately two (2) years. Prior to being employed as a Special Agent with the FBI, I was a Law Enforcement and Security Specialist with the United States Air Force for approximately eight (8) years. As a Special Agent with the FBI, I am a law enforcement officer of the United States as defined by 18 U.S.C. § 2510(7), meaning that I am empowered by law to conduct investigations of and to make arrests for violations of Federal law, including violations of the Major Crimes Act (MCA). During my time as a Special Agent, I have participated in numerous criminal investigations as the primary investigator or in a backup capacity. I have also received significant training in criminal investigations, including investigations into violent crimes.

2. As a Federal Agent, I am authorized to investigate violations of the laws of the United States, and to execute warrants issued under the authority of the United States.

3. The statements contained in this Affidavit are based in part on: information provided by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that JASON LEON CRUSE, committed the below-described offense, I have not included every detail of the

investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

SUMMARY OF PROBABLE CAUSE

4. As will be shown below, there is probable cause to believe that JASON LEON CRUSE committed Murder in the First Degree in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151 & 1153.

5. VENUE: the facts and circumstances alleged in this affidavit occurred in Sulphur, Oklahoma, within the Eastern District of Oklahoma. More specifically, based on the Supreme Court decision in *McGirt v. Oklahoma* (2020), the below described location is within the geographic boundaries of the Chickasaw Nation, and therefore is within Indian Country.

6. DEFENDANT: the defendant JASON LEON CRUSE, (DOB: xx/xx/1980), hereinafter referred to as CRUSE, is an enrolled member of the Choctaw Nation Tribe of Oklahoma.

7. VICTIM: the victim RICHARD BENJAMIN JONES, hereinafter referred to as JONES, was enrolled as a member of the Choctaw Nation Tribe of Oklahoma.

8. I received information regarding a crime which occurred in Murray County, Sulphur, Oklahoma within the boundaries of Chickasaw Nation. This affidavit is intended to show there is sufficient probable cause for a Complaint and does not set forth all of my knowledge about this matter. This affidavit is made in support of a Complaint and Arrest Warrant for the crime in violation of Title 18, United States Code, Sections 1111(a), 1151 & 1153. In support of this request, I submit the following.

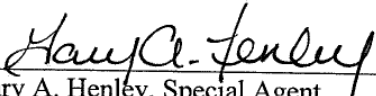
9. On June 18, 2000, CRUSE murdered JONES at JONES's residence. In the early morning hours of June 18, 2000, CRUSE went to 1705 Circle Drive, apartment B, Sulphur,

Oklahoma, looking for his girlfriend Sheila Amos, and kicked on JONES's front door. JONES was at the residence with Amos, Antoine Colungo, Allen Jones, and Sondra Willmond. JONES opened the front door, at which time, CRUSE kicked the door a second time at which time the door swung open. CRUSE asked JONES where his girlfriend was. JONES pointed towards the bathroom and told CRUSE that his girlfriend was in the back. CRUSE began to walk into the residence, during which time JONES put his arms out to stop CRUSE from coming inside. CRUSE then reached over JONES with a black handle knife and stabbed JONES in the upper left chest. CRUSE continued swinging the knife at which time JONES and Allen Jones grabbed CRUSE and wrestled him out to the breezeway area of the apartment complex. While JONES and Allen Jones were on top of CRUSE, Everette Berryhill, CRUSE's brother, who came to JONES's residence with CRUSE, came up to the scuffle from the parking lot area and jumped on top of Allen Jones. Colungo came out and saw that JONES was bleeding and told him to get into the house to check his wound. JONES went into the residence while Allen Jones continued to wrestle CRUSE. Berryhill told Allen Jones that CRUSE was not going to stab anyone else, during which time Allen Jones got up and went into the residence to check on JONES. Berryhill grabbed ahold of the knife from CRUSE but left it near JONES's residence. CRUSE ran away from the scene but Berryhill stayed. Allen Jones eventually got the knife and put it into a windowsill in JONES's residence. Allen Jones then took JONES to Arbuckle Memorial Hospital where he died from the stab wound.

10. On June 18th, 2000, CRUSE was arrested and charged with Murder in the First Degree in the District Court of Murray County of the State of Oklahoma.


11. Based on a review of this case, and based on my knowledge and experience with violent crimes, I, as your Affiant have probable cause to believe JASON LEON CRUSE committed the offense of Murder in the First Degree in Indian Country, in violation of Title 18, United States Code, Sections 1111(A), 1151 & 1153.

Respectfully Submitted,



Gary A. Henley, Special Agent
Federal Bureau of Investigation

Sworn before me this 17th day of June 2021.



UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF OKLAHOMA